

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
Civil Action No. 24-CV-380

C.M., *a minor, through his parents,* )  
LEAH McGHEE *and* CHAD McGHEE, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
DAVIDSON COUNTY SCHOOL )  
DISTRICT BOARD OF EDUCATION; )  
*and* ERIC R. ANDERSON, in his )  
individual capacity, )  
 )  
Defendants. )

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**JOINT LOCAL RULE 5.5 REPORT  
FOR THE FILING OF SEALED  
DOCUMENTS**

NOW COME the Plaintiff C.M. a minor, through his parents, Leah McGhee and Chad McGhee, and Defendants, by and through their undersigned counsel of record, and hereby submit this Joint Local Rule 5.5 Report for the Filing of Sealed Documents.

1. Pursuant to Fed. R. Civ. P. 26(f) and L.R. 5.4(b)(1), a meeting was held on June 18, 2024 via telephone conference and was attended by the undersigned counsel for the parties.

2. Conference: The parties have discussed the issues of confidentiality raised in this case and the need for filing portions of documents under seal as required by Family Educational Rights and Privacy Act (“FERPA”) pursuant to 20 U.S.C. § 1232(g) and 34 C.F.R. Part 99. That discussion included the nature of any confidential documents that may be involved in the case, to the extent possible, the possibility of using stipulations

to avoid the need to file certain documents, and the possibility of agreed-upon redactions of immaterial confidential information in filings to avoid the need for filing documents under seal. The parties agree to have further discussions regarding a potential agreement as to the disclosure of information protected by FERPA to determine whether their clients consent to the disclosure by Defendants after the court orders disclosure of the redacted information in the Defendants' Opposition to Plaintiff's Motion for Preliminary Injunction and accompanying exhibits to the Plaintiff's counsel for use in the litigation of this matter.

3. The parties certify that there will be portions of several documents which will need to be filed under seal because of the Family Education Rights and Privacy Act ("FERPA") as this case involves minors in an educational setting and information otherwise protected by FERPA. The parties otherwise agree to use the default procedures of LR 5.4(c).

This the 28<sup>th</sup> day of June, 2024.

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